

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

TARA SUZANNE FARQUE and)	
BRIAN DAVID FARQUE,)	Civil Action No.: 2:20-cv-002245-RMG
)	
Plaintiff,)	
)	
v.)	DEFENDANT'S DISCLOSURE OF
)	EXPERT WITNESSES
DEON A. DEAS and)	
TAMARA GONZALEZ,)	
)	
Defendants.)	
)	

Pursuant to Federal Rule of Civil Procedure 26(a)(2) and this Court's July 9, 2021

Second Amended Scheduling Order, Defendants disclose the identities of the following expert Witness(es) whom Defendants intend to tender at trial. In accordance with the Court's Order, the Expert's written reports are being filed concurrently with this disclosure.

EXPERT WITNESS ONE

Name:	Dr. Mark Wagner
Address:	203 Rutledge Avenue Charleston, SC 29403
Area of Expertise:	Neuro-Psychologist
Written Report	Attached hereto as Exhibit #1
Statement of Opinions	Outlined in the Written Report (Exhibit #1)
Facts considered	Outlined in the Written Report (Exhibit #1)
Exhibits	All medical records of the Plaintiffs All Scientific References Cited (attached in Exhibit #1)
Qualifications	Attached in Dr Wagner's CV Exhibit #2
Case list	Exhibit #3

Invoices

Exhibit #4

MILLIGAN & HERNS, PC

s/ *Tom Milligan*

Thomas H. Milligan (SC Bar 12272)
721 Long Point Road, Suite 401
Mount Pleasant, SC 29464
Phone: (843) 971-6750
Fax: (843) 971-6509
Email: tom@milliganlawfirm.com

September 24, 2021
Mount Pleasant, South Carolina

ATTORNEYS FOR THE DEFENDANT